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January 12, 2021

DELIVERED VIA ECF

Honorable Edgardo Ramos
Thurgood Marshall U.S. Courthouse
40 Foley Square
Courtroom 619
New York, New York 10007

MEMO ENDORSED, page 2.

Case Title: *Seliger v. Breitbart News Network LLC;*
1:20-cv-02860-ER
Re: **Request for Extension and Adjournment of Case
Management Conference**

Your Honor:

Our office represents Plaintiff Mark Seliger ("Seliger") in this copyright infringement matter involving a single photograph. We write pursuant to Rule 1E of Your Honor's Individual Practices and with consent of defense counsel to respectfully request a 14-day extension of certain discovery deadlines. The reason for this request is that the parties have recently resolved a discovery dispute and are awaiting production of certain documents and information, which is scheduled to take place by the end of this week. There have been no previous requests for an extension.

The parties respectfully request that the deadlines for initial expert disclosures be extended from January 15 to January 29, rebuttal expert reports be extended from January 29 to February 12, and expert depositions and the close of all discovery be extended from February 12 to February 26. The parties also respectfully request that the next case management conference, currently scheduled for February 12, 2021 at 11:30 a.m., be adjourned to the week of March 8 or a date convenient to the Court.

We thank Your Honor for consideration of this request.

Respectfully submitted,

By: /s/ Scott Alan Burroughs
Scott Alan Burroughs
Laura M. Zaharia
DONIGER / BURROUGHS
For the Plaintiff

~~Proposed~~ Revised Scheduling Order

The deadline for initial expert disclosures is extended from January 15 to January 29;
The deadline for rebuttal expert reports is extended from January 29 to February 12; and
The deadline for expert depositions and all discovery is extended from February 12 to February 26.
The next case management conference is scheduled for February 26, 2021 at 11:30 a.m..
The February 12 case management conference is adjourned.
SO ORDERED.

Dated: January 13, 2021
New York, New York



Honorable Edgardo Ramos, U.S. District Judge